

William K. Hubbard
Docket Management Branch (HFA-305)
Food and Drug Administration
5630 fishers Lane, Rm 1061
Rockville, MD 20852

Re: Performance Standard for *Vibrio vulnificus*, docket number 98P-0504 Vol.
64, No. 13, pg. 3300-3301

Mr. Hubbard:

The Center for Science and Public Interest (CSPI) has submitted a petition in regard to the treatment of V. vulnificus, in essence, they are asking to implement the treatment of this bacteria through the use of a patented pasteurization process developed by Ameripure.

The issue should be addressed to the industry as a whole including producers, processors, academia, and consumers, in that manner it is much more likely to find solution that will satisfy us all.

I want to stress, that before the FDA implements policies of public health that affect our industry, it would be wise to address and put before the industry, the issues at hand. We have worked for many years in establishing an organ (ISSC) that addresses this type of issues where all those affected can have a voice and a vote. The concerns of CSPI are legitimate but in no manner they present a solution that will be satisfactory with the industry as a whole including the consumer.

The problem that *V. vulnificus* creates does not exist all year round and when it has manifested itself, the industry has taken the right steps to correct it. The ISSC has far stricter controls than those suggested by State and Federal regulators.

I urge the FDA to work together with the ISSC to find common solutions that will benefit us all and not one single group. There is research being conducted right now to make the products we produce safer to the consumer. It would be of help if FDA could learn about this options and help fund them so that the issue is solved in the short term.

I thank you for your attention to the present.

Sincerely,

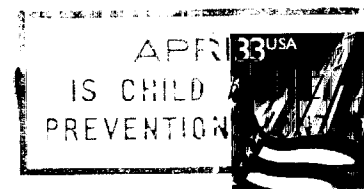

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98P-0504

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